

## Field, Jeff

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**From:** Vann, Bradley  
**Sent:** Saturday, August 15, 2015 11:38 AM  
**To:** Paul Rosasco; 'Divine, Craig'  
**Cc:** Field, Jeff; Doster, Branden; Peterson, Mary; Stoy, Alyse; Juett, Lynn  
**Subject:** RE: Responses to EPA Specific Comments No. 1 and 2 - Work Plan for Additional Characterization of Areas 1 and 2

Paul/Craig,

Per our discussions yesterday with Jeff, Mary and myself following our programs' afternoon teleconference briefing with Brand Doster at MDNR, please respond to closeout these remaining emailed comments (emailed 8/10/15) to ensure they do not conflict in the documented record with the parties' written responses received last night (8/14/15) and specific to regulators comments sent on 7/31/15.

It is noted, EMSI agreed to provide MDNR with a map of the site's relevant outfalls and list of COCs for ongoing NPL activities and coordinate as required to meet substantive federal and state law/regulations (per EPA's emailed comment #1 and 3 below and our technical discussion held yesterday). Branden is the identified MDNR POC for which to coordinate and provide this information. Also based on yesterday's conversation, EPA comment #2, requiring the collection of sediment samples prior to starting vegetation clearing has been withdrawn by EPA, as this data already exists historically and therefore has limited utility. It was further discussed yesterday between EPA and MDNR and then in follow up with EMSI that reviewers' comments regarding monitoring of storm water discharges from landfills, though relevant to the site as a whole, does not affect the proposed limited vegetation clearing and drilling/sampling preparations for this pending work. That determination was supported by the negotiated drilling locations (i.e., not on landfill slopes or off site areas), limited scope, parties' prior identification of existing runoff management features, and clarifications in yesterday's responses for the proposed vegetation clearing processes and mitigation controls.

With regards to all of the parties responses, EPA and MDNR are reviewing them and expect to provide an expedited response this coming week of August 17. EPA is however approving parties to begin coordination and scheduling of the field preparation work (Field Investigation and Sample Collection and Analyses, Task 1 and 2) as soon as possible. EPA also would expect tentative coordination with the necessary drilling firms and support personnel to ensure a seamless transition to the other site tasks, as appropriately identified in parties' comment responses. Please let us know when the field preparation work will begin, and the tentative drilling schedule is established, so EPA and MDNR can also coordinate our field oversight personnel accordingly.

Regards,

Bradley Vann - Remedial Project Manager  
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**From:** Vann, Bradley  
**Sent:** Monday, August 10, 2015 7:37 AM  
**To:** 'Paul Rosasco'  
**Cc:** Field, Jeff; 'Doster, Branden'

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8/15/15



**Subject:** RE: Responses to EPA Specific Comments No. 1 and 2 - Work Plan for Additional Characterization of Areas 1 and 2

Paul,

The parties' responses to EPA comments 1 & 2 are acceptable; however, the state has also comments for which EPA concurs that warrant addressing, prior to starting vegetation clearing (MDNR comments 1-3), and can be addressed in email to expedite the effort. Your responses to EPA's comments has information that should adequately address MDNR's concerns for comments 1 and 3 and has been forwarded to Branden Doster (note, Shawn Muenks is now with another program and no longer the state POC for this site). Comment 2a-2c needs to be addressed before approval can be sent to start this phase of fieldwork. EPA project team discussed these issues with MDNR personnel last week. A key element is the State's citation of federal and state regulations that warrant NPDES monitoring for landfills. As West Lake is a NPL site and work is being performed onsite, it was understood that parties are not required to obtain a wastewater permit but the following associated substantively elements must be addressed in the work plan addendum:

- 1) Identify any relevant surface drainage outfalls in the work plan and include plans for surface water monitoring samples in addition to the sediment sampling already outlined. As with sediment sampling, surface water sampling should occur if sufficient precipitation occurs that creates runoff from the site and into outfalls.
- 2) EPA recommends collecting sediment samples prior to performing vegetation clearing in drainage prone areas to provide baseline should post runoff samples be required following a precipitation event. EPA also recommends deployment of surface water mitigation efforts prior to starting vegetation clearing (and as defined in the work plan) in those areas that are prone to runoff.
- 3) Submit a list of site COCs with the appropriate water quality standards as performed during the RI to MDNR's wastewater program. Their program is committed to processing it as a priority and its completion will not delay performance of the vegetation clearing. Example: below is a list copies from the site RI Report with regards to historical surface water sampling. This list needs to be submitted with a NPDES permit application and necessary to meet ARARs for storm water requirements and consistent with prior RI/FS efforts. While the COCs will not change, the water program may add other water quality parameters not list below to meet substantive requirements.

These COCs were found in "Appendix D: Radiological and Non-Radiological Analytical Results For Surface Water Samples", of the RI.

Uranium-238	Lead
Thorium-234	Zinc
Uranium-234	Diesel Range
Thorium-230	Motor Oil Range
Radium-226	Benzene
Lead-214	Ethyl benzene
Bismuth-214	m&p Xylene
Lead-210	Chlorobenzene
Uranium-235/236	1,4-Dichlorobenzene
Uranium-235	2,4-Dimethylphenol
Protactinium-231	pH
Actinium-227	Total Dissolved Solids (TDS)
Radium-223	Total Suspended Solids (TSS)
Thorium-232	Chloride
Radium-228	Nitrate
Thorium-228	Total Phosphate
Radium-224	Chemical Oxygen Demand (COD)
Lead-211	Total Organic Carbon (TOC)
Thallium-208	Ammonia
	Total Cyanide*

	Biochemical Oxygen Demand (BOD)* Nitrite* Sulfide*
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\* indicates COC was tested, but no parameters were detected, so they were not included in the results table.

I am traveling to today to attend the CAG this evening but please call me if you have any questions.

Regards,

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**From:** Paul Rosasco [<mailto:paulrosasco@emsidenver.com>]

**Sent:** Tuesday, August 04, 2015 10:50 PM

**To:** Vann, Bradley; 'Drake, Tiffany'

**Cc:** McGahren, John; Russell R. Eggert; 'Guariglia, Dale'; 'Beck, Bill (LG)'; Merrigan, Jessie; 'Johnson, Nicholas R. (LG)'; 'Warren, Victoria'; Dan Feezor; Bob Jelinek

**Subject:** Responses to EPA Specific Comments No. 1 and 2 - Work Plan for Additional Characterization of Areas 1 and 2

Brad,

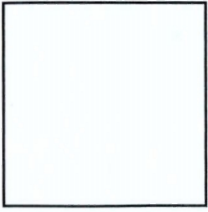
Per your July 31, 2015 letter transmitting EPA's comments on the Work Plan for Additional Characterization of Areas 1 and 2, please find attached, responses to EPA's Specific Comments No. 1 and 2. We are working on preparing responses to EPA's other comments and the MDNR comments.

Please let us know if you have any questions or require any additional information with respect to these responses.

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